

WILLIAM B. CAREY, 8212160  
Attorney for Defendant  
CARLOS L. RAINEY  
1502 West 34th Avenue  
Anchorage, Alaska 99503

Telephone: (907) 272-4255  
Facsimile: (907) 272-4256

RECEIVED  
MAR 10 2006  
CLERK U.S. DISTRICT COURT  
ANCHORAGE, ALASKA

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	<b><u>MOTION TO EXTEND</u></b>
	)	
vs.	)	<b><u>MOTIONS DEADLINE</u></b>
	)	
CARLOS L. RAINEY,	)	
	)	
Defendant.	)	Case No. A05-008 (JWS)

COMES NOW the Defendant, CARLOS L. RAINEY, through counsel, WILLIAM B. CAREY, and moves the Court to extend the deadline for filing motions in this case from March 15 to March 31, 2006.

The basis of this motion is as follows:

1. Defendant, CARLOS L. RAINEY, is charged with being with one of the lead actors in this multi-defendant drug conspiracy. There is an enormous amount of discovery that has been provided in this case, much of it purporting to involve Mr. RAINEY. Dozens of CD's with over 100 hours of materials have been provided and the undersigned counsel has not had the opportunity to go through everything. Earlier this week, counsel for Mr. RAINEY was advised that there was further discovery available at the U.S. Attorney's Office. These materials are being picked up today.

WILLIAM B. CAREY  
ATTORNEY AT LAW  
1502 WEST 34TH AVENUE  
ANCHORAGE, ALASKA 99503  
TELEPHONE (907) 272-4255  
TELECOPIER (907) 272-4256

Given time constraints and the enormous amount of discovery material in this matter, the undersigned has not been able to review anything close to all of the materials that might be used in the preparation of motions. The undersigned also has a busy practice that requires him to be in Southeast Alaska on a frequent basis, including most of last week in Petersburg and the unexpected necessity of going to trial in a State Court matter in Juneau early next week. It has been completely impracticable under these circumstances to complete the review of discovery necessary to determine what motions might be filed and to complete the research involved. With the exercise of due diligence, it is anticipated that the requested extension of time should provide sufficient time too put together whatever motions might be necessary or to Mr. RAINEY's benefit.

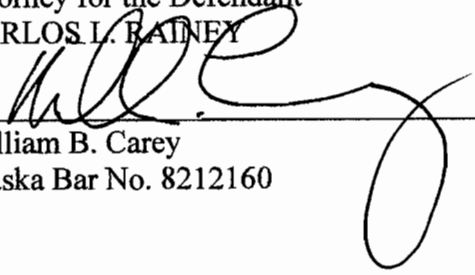
For the foregoing reasons, an extension of time until March 31 to file motions, including requests for evidentiary hearings, is requested. This should still provide sufficient time for the Government to respond and to resolve issues raised by motions prior to the trial date in June.

A period of delay under 18 U.S.C. § 31610(g) and (h) may occur as a result of the granting of this motion.

This motion is supported by the attached affidavit of WILLIAM B. CAREY.

DATED in Anchorage, Alaska this 10 day of March, 2005.

WILLIAM B. CAREY  
Attorney for the Defendant  
CARLOS L. RAINEY

  
\_\_\_\_\_  
William B. Carey  
Alaska Bar No. 8212160

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of March, 2006, a copy of the forgoing Motion to Extend Motions Deadline was electronically served on the following:

Stephan Collins  
Mike Dieni  
Allan Beiswenger  
D. Scott Dattan  
John C. Pharr  
Scott Sterling  
Lance Wells  
Burke Wonnell  
Mark Rosenbaum  
Raul Martinez  
Hugh Fleischer

Blenda W. Wynn

WILLIAM B. CAREY  
ATTORNEY AT LAW  
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ANCHORAGE, ALASKA 99503  
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TELECOPIER (907) 272-4256